## U.S. DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

ROHALEY AND SON AUTOMOTIVE, INC.	
aka ROHALEY AND SON AUTOMOTIVE,	] Case No: 1:18-cv-2825
CHAD M. LEONARD and CHAD M.	] Hon.
LEONARD HOLDINGS, INC.,	]
	]
Plaintiffs,	] Lower Court Case No. 18 CV 001799
	] Hon. Vincent A. Culotta
V	]
	NOTICE OF REMOVAL BASED ON
TRAVELERS CASUALTY INSURANCE	DIVERSITY OF CITIZENSHIP
COMPANY OF AMERICA	1

Defendant

\* \* \* \* \* \*

NOW COMES Defendant, Travelers Casualty Insurance Company of America, a Connecticut corporation, by and through its attorneys, Gregory and Meyer, P.C., and pursuant to 28 U.S.C.A. §1441, hereby files this Notice of Removal of a cause of action filed in the Cuyahoga County Common Pleas Court entitled, *Rohaley and Son Automotive, Inc aka Rohaley and Son Automotive, Chad M. Leonard and Chad M. Leonard Holdings, Inc. v Travelers Casualty Insurance Company of America*, Lake County Common Pleas Court, Case No. 18 CV 001799, and states:

- 1. This action was commenced in the Lake County Common Pleas Court on November 7, 2018 and process, as well as the initial pleading setting forth the claim for relief upon which the action is based, was first served on the Defendant on November 9, 2018.
- 2. The action is a civil action for alleged breach of contract and bad faith by Defendant, and, pursuant to 28 U.S.C.A §1332(a)(1), this Court has original jurisdiction over the matter by reason of the diversity of citizenship of the parties. Upon information and belief,

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Rohaley and Son Automotive, Inc aka Rohaley and Son Automotive is an Ohio corporation and

maintains its office and principal place of business at 7481 Brenel Drive, Mentor, OH 44060.

Upon information and belief, Chad M. Leonard is a citizen and resident of the State of Ohio.

Upon information and belief, Chad M. Leonard Holdings, Inc. is an Ohio corporation and

maintains its office and principal place of business at 7481 Brenel Drive, Mentor, OH 44060

(Ex. A, ¶1-3); Defendant is incorporated and has its principal place of business in the State of

Connecticut; and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs

(**Ex. B**, Mentor Police records with inventory provided by Chad M. Leonard).

3. A copy of all process, pleadings, and orders served upon Defendant, as well as a

Proof of Service of written notice of this Notice of Removal to all adverse parties and a copy of

same being filed with the clerk of the State court is being filed with this notice as required by 28

USC§1446 (a) and (d).

4. A Proof of Service of written notice of this Notice of Removal to all adverse

parties is being filed with this Notice of Removal as required by 28 USC §1446(a) and (d).

s/ Kurt D. Meyer

KURT D. MEYER (0087580)

**GREGORY AND MEYER, P.C.** 

Attorneys for Defendant

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(0084349)

Dated: December 7, 2018

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## **CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2018, I electronically filed the foregoing *Notice of Removal Based on Diversity of Citizenship and this Certificate of Service* with the Clerk of the Court using the ECF system which will send notification of such filing to the following: **Not applicable.** 

I hereby further certify that I have mailed by United States Postal Service the foregoing *Notice of Removal Based on Diversity of Citizenship and this Certificate of Service* to the following non-ECF participants:

Harold Pollock Esq. **Harold Pollock Co. LPA**5900 Harper Road, Suite 107
Solon, OH 44139
esq@pollock-law.com

Clerk of the Court **Court of Common Pleas Lake County Ohio** 25 N. Park Place Painesville, OH 44077

Attorneys for Plaintiffs

s/ Kurt D. Meyer

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